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**Guy M. Hicks**  
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January 26, 2001

**VIA HAND DELIVERY**

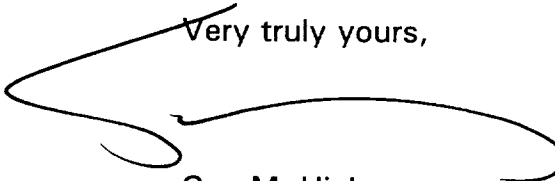
Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Adelphia Business Solutions of Tennessee, L.P. and AVR, L.P. d/b/a Hyperion of Tennessee, L.P., Inc. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996.*  
Docket No. 00-00927

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the non-proprietary portions of BellSouth's Response to Adelphia's First Set of Information and Data Requests. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure



**CERTIFICATE OF SERVICE**

26  
I hereby certify that on January 10, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ US Mail
- ☐ Facsimile
- ☐ Overnight
- ☐ Electronic Mail

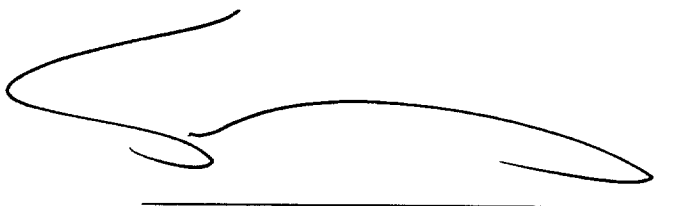
Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

- ☐ Hand
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- ☐ Overnight
- ☐ Electronic Mail

Michael L. Shor, Esq.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D. C. 20007

- ☐ Hand
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- ☐ Electronic Mail

John Glicksman, Esq.  
Adelphia Business Solutions  
One North Main Street  
Coudersport, PA 16915



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BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 1  
Page 1 of 1

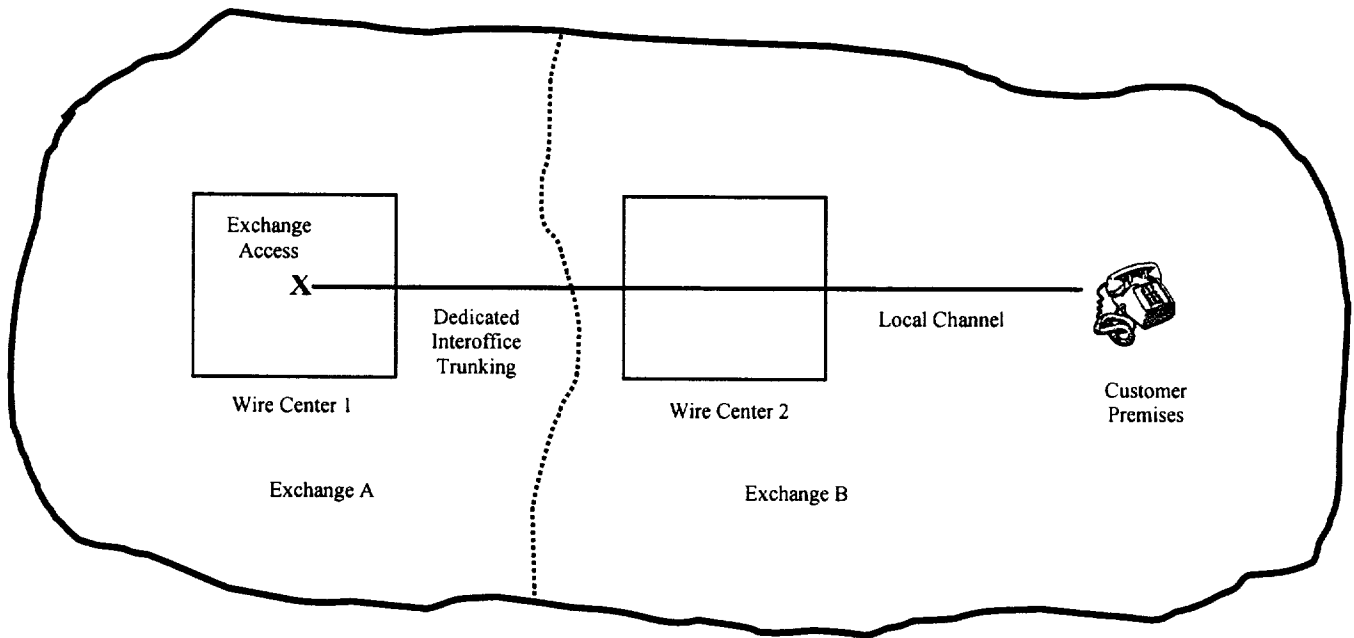
REQUEST: Identify each person whom you expect to call as an expert witness in this proceeding, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, a summary of the grounds for each opinion and identify all documents which the expert has reviewed or relied upon for the facts and opinions to which he will testify.

RESPONSE: BellSouth assumes that this Item seeks the identity of the person or persons who will present testimony on behalf of BellSouth in this matter, and BellSouth states that John Ruscilli will be BellSouth's witness. Mr. Ruscilli will testify as to the issues that are to be arbitrated and decided by the Authority in Docket No. 00-00927. The specific testimony of Mr. Ruscilli will be pre-filed with the Authority and served upon Adelphia in accordance with the procedural schedule. BellSouth objects to Adelphia's 1<sup>st</sup> Data Request, Item No. 1, to the extent that it requires BellSouth to divulge information regarding this pre-filed testimony at any date earlier than the date that such testimony must actually be pre-filed. In preparing testimony, BellSouth's witnesses rely on a variety of subject matter experts, attorneys and general support personnel, the identification of whom is not relevant to any of the issues raised in this proceeding.



REQUEST: Please provide a technical description of how your FX service is provided to customers, including diagrams and descriptions of ancillary features (e.g., collocation of customer equipment).

RESPONSE: BellSouth objects to this data request on the grounds that it is overly broad, that responding to it would be unduly burdensome, and that it seeks information that is not relevant and that is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the aforementioned objections, BellSouth shows the following:



———— = LATA boundary  
..... = Local Calling Area Boundary

- Customer's premises would normally be served from Wire Center (WC) 2
- Customer desires telephone number from Wire Center 1
- Because Wire Centers 1 & 2 are in different exchanges, Foreign Exchange (FX) Service is provided.
- When the customer's phone goes off-hook, dial tone is provided from WC1 rather than WC2. No switching takes place in WC2.



RESPONSE: (continued)

Three generic functionalities are required for FX Service:

1. An exchange access capability which provides for a seven-digit telephone number and the switching necessary to connect the customer to the "normal" switched network. An FX customer served out of WC1 has the same basic non-optional local calling scope as any POTS line in the same wire center. Sometimes referred to as the "open end."
2. A dedicated interoffice voice-grade channel between the dial-tone office and the normal serving wire center of the customer's premises.
3. A dedicated local channel connecting the customer's premises with the interoffice channel.



**REQUEST:** Please explain how you rate each of the following types of traffic originated or terminated to your FX customers, and provide all documentation supporting your answer:

- a. A call placed by a BellSouth end user to a BellSouth FX customer where the NXX code of the dialed number is within the calling party's local calling area, but the FX customer is not physically located within that local calling area.
- b. A call placed by a BellSouth FX customer to a BellSouth end user where the dialed number is within the local calling area of the NXX code assigned to the FX customer, but the FX customer is not physically located in that local calling area.
- c. A call placed by a BellSouth end user to a BellSouth FX customer where the NXX code of the dialed number is within the same LATA as the calling party, but not within the same local calling area, and where the FX customer is physically located in the same local calling area as the calling party.
- d. A call placed by a BellSouth FX customer to a BellSouth end user where the dialed number is within the same LATA, but not within the same local calling area, as the NXX code assigned to the FX customer, and where the FX customer is physically located in the same local calling area as the called party.
- e. A call terminated by an interexchange carrier to a BellSouth FX customer.

**RESPONSE:** BellSouth objects to this request on the grounds that it is overly broad and that responding it would be unduly burdensome. Without waiving these objections, BellSouth provides the following responses.

- a. A call placed by a BellSouth end user to a BellSouth FX customer where the NXX code of the dialed number is within the calling party's local calling area, but the FX customer is not physically located within that local calling area, is rated and billed, for retail



RESPONSE: (continued)

purposes, as a local call. The rates the BellSouth end user pays for placing that call to the FX customer are booked as local revenue.

- b. A call placed by a BellSouth FX customer to a BellSouth end user where the dialed number is within the local calling area of the NXX code assigned to the FX customer, but the FX customer is not physically located in that local calling area, is rated and billed, for retail purposes, as a local call. The rates the FX customer pays for local service are booked as local revenue.
- c. A call placed by a BellSouth end user to a BellSouth FX customer where the NXX code of the dialed number is within the same LATA as the calling party, but not within the same local calling area, and where the FX customer is physically located in the same local calling area as the calling party, is rated and billed, for retail purposes, as a local call (which is booked as local revenue) or a toll call (which is booked as toll revenue) depending on the service subscribed to by the BellSouth end user placing the call. Most BellSouth customers with FX lines, however, also subscribe to one or more local service lines with NXX codes that are associated



RESPONSE: (continued)

with the local calling area in which the FX customer is physically located. It is more likely, therefore, that the BellSouth end user described in this subpart would call the FX customer on its local service line (as opposed to its FX line). In that case, the call would be rated and billed, for retail purposes, as a local call, and the rates for that call would be booked as local revenue.

- d. A call placed by a BellSouth FX customer to a BellSouth end user where the dialed number is within the same LATA, but not within the same local calling area, as the NXX code assigned to the FX customer, and where the FX customer is physically located in the same local calling area as the called party, is rated, for retail purposes, as a toll call. The rates for this call would be booked as toll revenue. Most BellSouth customers with FX lines, however, also subscribe to one or more local service lines with NXX codes that are associated with the local calling area in which the FX customer is physically located. It is more likely, therefore, that the FX customer described in this subpart would use its local service line (as opposed to its FX line) to call the BellSouth end user described in this subpart. In that case, the call would be rated and billed, for retail purposes, as a local call.
- e. A call terminated by an interexchange carrier to a BellSouth FX customer is rated and billed, for inter-carrier compensation purposes, as an access call. This revenue would be booked as network access revenue.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 4  
Page 1 of 1

REQUEST: Please explain how you bill each of the types of traffic identified in request 3 originated or terminated to your FX customers, and provide all documentation supporting your answer.

RESPONSE: Please see BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 3.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 5  
Page 1 of 1

REQUEST: Please explain how you account for each of the types of traffic identified in request 3 originated or terminated to your FX customers, and provide all documentation supporting your answer.

RESPONSE: Please see BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 3.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 6  
Page 1 of 1

REQUEST: Please identify the number of customers in Tennessee who subscribe to or purchase your FX service.

RESPONSE: BellSouth does not maintain the number of customers for this service. As of December 2000, BellSouth provided 2,292 intraLATA FX lines in the State of Tennessee.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 7  
Page 1 of 1

REQUEST: Have you ever billed or received reciprocal compensation for calls received from CLECs for termination to your FX customers? Please explain your answer.

RESPONSE: Currently, BellSouth bills a CLEC for reciprocal compensation for calls from the CLEC's end users to a BellSouth FX subscriber that is not an Internet service provider ("ISP"). BellSouth does not bill CLECs for reciprocal compensation for calls from the CLEC's end users to a BellSouth FX subscriber that is an ISP. BellSouth, however, is implementing a process to ensure that no reciprocal compensation is charged for any calls to BellSouth's FX customers. See BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 30.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 8  
Page 1 of 1

REQUEST: Are there any circumstances in which BellSouth must pay access charges to the originating carrier for a call originated by another carrier and terminating to a BellSouth FX customer? If so, please describe all circumstances under which such an obligation may arise.

RESPONSE: BellSouth objects to this request on the grounds that it is vague and confusing. Without waiving this objection, BellSouth responds that if the Authority adopts BellSouth's position on the "Virtual NXX" issue in this arbitration, BellSouth should (and will) pay originating access charges to the originating CLEC when that CLEC's end users place calls to a BellSouth FX number.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 9  
Page 1 of 1

REQUEST: Please state whether you offer any FX-like service; e.g., do you currently offer any services or products to your customers, other than FX service, under which a customer can obtain a telephone number with an "NXX" associated with a local calling area that is different from the local calling area in which the customer has a physical presence.

RESPONSE: As the term "FX-like service" is defined by Adelphia in the "Definitions" section of its discovery requests and the text of this request, yes. Neither this response nor any other response to a request regarding "FX-like service" should be read to imply that BellSouth agrees with Adelphia's definition of "FX-like service."



REQUEST: If the answer to the preceding DR is yes, please state the name of each such FX-Like Service, identify the tariff where the product is described, and provide copies of all product descriptions and marketing materials associated with each service offering.

RESPONSE: As explained in more detail in BellSouth's GSST A13.11, Remote Call Forwarding is a service whereby a call placed from a station (the originating station) to the RCF customer's telephone number (the call forwarding location) is automatically forwarded by central office equipment to another station designated by the RCF customer (the terminating station). Unlike FX service, RCF utilizes two separate telephone numbers. This product is not actively marketed, so no specific marketing materials are available.

In proceedings in other states, Adelphia has identified two other services that it suggests may meet Adelphia's definition of "FX-Like Service." BellSouth is reviewing these services to determine whether they meet this definition and, if they do, BellSouth will supplement its responses to this and related discovery requests in a timely fashion.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 11  
Page 1 of 1

REQUEST: Please provide the current effective and canceled tariff pages for the FX-Like services identified in your response to the preceding DR for the time period covered by these Discovery Requests.

RESPONSE: The requested excerpts from BellSouth's Tennessee General Subscriber Services Tariff NoA13.11 are attached.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 11

# ATTACHMENT



SOUTH CENTRAL BELL  
TELEPHONE COMPANY  
TENNESSEE

**GENERAL SUBSCRIBER SERVICES TARIFF**

Original Page 7.1

ISSUED: December 20, 1993

EFFECTIVE: February 3, 1994

BY: President - Tennessee  
Nashville, Tennessee

**A13. MISCELLANEOUS SERVICE ARRANGEMENTS****A13.11 Remote Call Forwarding Service (Cont'd)****A13.11.1 General (Cont'd)**

- K. Where calls are to be forwarded to telephone service other than that of the RCF subscriber, it shall be the responsibility of the RCF subscriber to obtain permission for such forwarding from the subscriber to the other service and to determine a mutually acceptable number of access paths. Where the other subscriber contests such forwarding or the number of access paths, the Company reserves the right to modify the RCF service to the extent necessary to eliminate the other subscriber's complaint. The RCF subscriber shall be responsible for the tariffed charges for any resulting rearrangement of the RCF service.

(K)

**A13.11.2 Reserved For Future Use**

(M)

**A13.11.3 Reserved For Future Use**

(M)

Material appearing on this page previously appeared on page(s) 7 of this section



SOUTH CENTRAL BELL  
TELEPHONE COMPANY  
TENNESSEE

## GENERAL SUBSCRIBER SERVICES TARIFF

Fourth Revised Page 8  
Cancels Third Revised Page 8

ISSUED: December 20, 1993  
BY: President - Tennessee  
Nashville, Tennessee

EFFECTIVE: February 3, 1994

## A13. MISCELLANEOUS SERVICE ARRANGEMENTS

## A13.11 Remote Call Forwarding Service (Cont'd)

## A13.11.4 Minimum Contract Period

The minimum contract period for this service is one month.

## A13.11.5 Rates And Charges

The following charges are for the Remote Call Forwarding feature only and are in addition to applicable charges for any service and equipment with which it is used.

Where customers have fifteen or more unique RCF features on a billing account, a credit of twenty-five percent (25%) will be applied per billing cycle to the monthly rate for each such unique service feature, including the first fifteen. For purposes of qualifying for such credit, a unique feature is defined by calling scope, jurisdiction and business/residence classification: e.g., Residence, Intrastate, IntraLATA; or, Business, Measured Local. Additional features (Calling Paths) also qualify as a unique feature. Unique features may not be combined to qualify for this credit; e.g., local features may not be combined with toll features.

## A. Remote Call Forwarding Service

1. Per initial feature arranged and one access path for either interexchange, intraexchange, or local calling area, per service request.

	Installation Charge	Monthly Rate	USOC
(a) Each	\$12.50	\$16.00	RCF++
2. Per additional feature, on same service request			
(a) Each	-	16.00	RCA
3. Per first additional feature on subsequent service request			
(a) Each	12.50	16.00	RCA

## B. Message Charges

The message charges applicable to remotely forwarded calls shall be comprised of two separate charges:

1. a charge for that portion of the call from the originating station to the call forwarding location, and
2. a charge for that portion of the call from the call forwarding location to the terminating station.

The respective charge for each such portion shall be as follows:

- a. Between the originating station and call forwarding location.

The charge for this portion of a remotely forwarded call shall be the charge specified in this *or any other applicable* Tariff for the type of call involved.

- b. Between the call forwarding location and the terminating station.

The Remote Call Forwarding customer is responsible for the applicable toll charges. These charges apply to all calls answered at the terminating station, including person-to-person and collect calls, even though such calls might not be accepted at the answering location.

Where Remote Call Forwarding is utilized for forwarding of calls within the local calling area, the measured service rates effective for that local calling area are applicable for each call answered at the terminating station line.

Material previously appearing on this page now appears on page(s) 8.1 of this section



SOUTH CENTRAL BELL  
TELEPHONE COMPANY  
TENNESSEE

## GENERAL SUBSCRIBER SERVICES TARIFF

First Revised Page 8.1  
Cancels Original Page 8.1

ISSUED: March 17, 1995  
BY: President - Tennessee  
Nashville, Tennessee

EFFECTIVE: April 20, 1995

**A13. MISCELLANEOUS SERVICE ARRANGEMENTS****A13.11 Remote Call Forwarding Service (Cont'd)****A13.11.5 Rates And Charges (Cont'd)****B. Message Charges (Cont'd)****2. (Cont'd)****b. Between the call forwarding location and the terminating station. (Cont'd)**

Calls which terminate within the local calling area will be billed usage charges as described in Section A3. of this Tariff, as appropriate. Provisions contained in A3.1.f. govern the specific usage rates to be applied. Plan options, usage allowances, and usage caps are not applicable to these usage charges.

**C. Service Charges as shown in Section A4. of this Tariff apply as follows:<sup>1</sup>**

1. For the initial installation of Remote Call Forwarding Service, or a subsequent addition to an existing Remote Call Forwarding Service, apply the *Secondary* Service Charge. (T)
2. To change the number of the call forwarding location, or to revise the terminating location number at the call forwarding location, or to do both on the same order, apply the *Secondary* Service Charge. (T)

**Note 1:** These changes result from the restructure of Section A4. and are to be implemented on May 9, 1995. (N)



BELLSOUTH  
TELECOMMUNICATIONS, INC.  
TENNESSEE  
ISSUED: July 12, 1999  
BY: President - Tennessee  
Nashville, Tennessee

## GENERAL SUBSCRIBER SERVICES TARIFF

Ninth Revised Page 9  
Cancels Eighth Revised Page 9

EFFECTIVE: November 4, 1999

**A13. MISCELLANEOUS SERVICE ARRANGEMENTS****A13.11 Remote Call Forwarding Service (Cont'd)**

A13.11.6 Reserved For Future Use

A13.11.7 Reserved For Future Use

**A13.12 Selective Class Of Call Screening Service**

This service is a Flex-Price service and is regulated under terms and conditions as described in A2.3.26 of this Tariff.

**A13.12.1 General**

- A. Selective Class of Call Screening Service enables a customer to secure central office blocking of originating 1+, 101XXXX 1+, 976 and 900 service calls. Additionally, specific screening information from the originating line is sent to the operator on Company handled intraLATA calls to prevent operator assisted calls from being billed to the subscriber's line. Information digits are also passed to long distance providers, other than the Company, to identify the line as requiring special operator handling.
- B. Selective Class of Call Screening Service is available only from central offices which have been arranged to provide these services. The service is provided subject to the availability of facilities. This service is not compatible with all service offerings such as Customized Code Restriction, International Call Blocking and Toll Tenninats.
- C. Subscribing to this service does not relieve the subscriber of responsibility for calls, other than Company intraLATA calls, which originate from the number. Failure of other long distance providers to act on the information digits passed to them could result in charges being placed on the subscriber's number.
- D. All local calls and calls to Company numbers such as repair service, Directory Assistance Service and public emergency service numbers such as 911 and 1+ 800 calls will be permitted from the establishment.
- E. This service is available to all business and residence customers.
- F. Selective Class of Call Screening can be suspended as specified in A2.3.16 of this Tariff. During the period of suspension, no recurring charge applies.

**A13.12.2 Rates And Charges**

- A. The following rates and charges will apply in addition to a Service Charge.

1. MultiServ<sup>®</sup> service and PBX Trunk

	Monthly Rate	USOC	
(a) Per central office line equipped for screening including MultiServ <sup>®</sup> service main station lines	\$1.10	SRG	(1)
(b) (Obsoleted, See Section A113.)	-	NA	(1)
(c) Per PBX trunk equipped for screening	7.10	SRG	(1)
2. ESSX <sup>®</sup> service, Digital ESSX <sup>®</sup> service, MultiServ <sup>®</sup> PLUS service, and BellSouth <sup>®</sup> Centrex service			(1)
(a) Per NAR equipped for screening	7.10	SRGRB	
(b) Per main station line equipped for screening	-	SRGPL	

**A13.13 Dormitory Communications Service****A13.13.1 General**

- A. Dormitory Communications Service (DCS) is available to public and private educational institutions for residential use by students, faculty members or employees who reside in dormitories or other residential quarters owned, leased, or under the supervision of the educational institution.



BELLSOUTH  
TELECOMMUNICATIONS, INC.  
TENNESSEE

## GENERAL SUBSCRIBER SERVICES TARIFF

Highly Revised Page 9  
Cancels Seventh Revised Page 9

ISSUED: June 1, 1998  
BY: President - Tennessee  
Nashville, Tennessee

EFFECTIVE: July 1, 1998

**A13. MISCELLANEOUS SERVICE ARRANGEMENTS****A13.11 Remote Call Forwarding Service (Cont'd)**

A13.11.6 Reserved For Future Use

A13.11.7 Reserved For Future Use

**A13.12 Selective Class Of Call Screening Service**

This service is a Flex-Price service and is regulated under terms and conditions as described in A2.3.26 of this Tariff.

**A13.12.1 General**

- A. Selective Class of Call Screening Service enables a customer to secure central office blocking of originating 1+, 101XXXX 1+, 976 and 900 service calls. Additionally, specific screening information from the originating line is sent to the operator on Company handled intraLATA calls to prevent operator assisted calls from being billed to the subscriber's line. Information digits are also passed to long distance providers, other than the Company, to identify the line as requiring special operator handling.
- B. Selective Class of Call Screening Service is available only from central offices which have been arranged to provide these services. The service is provided subject to the availability of facilities. This service is not compatible with all service offerings such as Customized Code Restriction, International Call Blocking and Toll Terminals.
- C. Subscribing to this service does not relieve the subscriber of responsibility for calls, other than Company intraLATA calls, which originate from the number. Failure of other long distance providers to act on the information digits passed to them could result in charges being placed on the subscriber's number.
- D. All local calls and calls to Company numbers such as repair service, Directory Assistance Service and public emergency service numbers such as 911 and 1+ 800 calls will be permitted from the establishment.
- E. This service is available to all business and residence customers.
- F. Selective Class of Call Screening can be suspended as specified in A2.3.16 of this Tariff. During the period of suspension, no recurring charge applies.

**A13.12.2 Rates And Charges**

- A. The following rates and charges will apply in addition to a Service Charge.

1. MultiServ® service and PBX Trunk

	Monthly Rate	USOC SRC
(a) Per central office line equipped for screening including MultiServ® service main station lines	\$1.10	
(b) (Obsolated, See Section A11.3.)	-	NA
(c) Per PBX trunk equipped for screening	7.10	SRG
2. ESSX® service, Digital ESSX® service and MultiServ PLUS® service		
(a) Per NAR equipped for screening	7.10	SRCPB
(b) Per main station line equipped for screening	-	SRGPL

**A13.13 Dormitory Communications Service****A13.13.1 General**

- A. Dormitory Communications Service (DCS) is available to public and private educational institutions for residential use by students, faculty members or employees who reside in dormitories or other residential quarters owned, leased, or under the supervision of the educational institution.

\* Service Mark of BellSouth Corporation

® Registered Service Mark of BellSouth Corporation



BELLSOUTH  
TELECOMMUNICATIONS, INC.  
TENNESSEE

## GENERAL SUBSCRIBER SERVICES TARIFF

Seventh Revised Page 9  
Cancels Sixth Revised Page 9

ISSUED: October 2, 1995  
BY: President - Tennessee  
Nashville, Tennessee

EFFECTIVE: February 20, 1996

**A13. MISCELLANEOUS SERVICE ARRANGEMENTS****A13.11 Remote Call Forwarding Service (Cont'd)**

A13.11.6 Reserved For Future Use

A13.11.7 Reserved For Future Use

**A13.12 Selective Class Of Call Screening Service**

This service is a Flex-Price service and is regulated under terms and conditions as described in A2.3.26 of this Tariff.

**A13.12.1 General**

- A. Selective Class of Call Screening Service enables a customer to secure central office blocking of originating 1+, 10XXXX 1+, 10XXXX 1+, 976 and 900 service calls. Additionally, specific screening information from the originating line is sent to the operator on Company handled intraLATA calls to prevent operator assisted calls from being billed to the subscriber's line. Information digits are also passed to long distance providers, other than the Company, to identify the line as requiring special operator handling.
- B. Selective Class of Call Screening Service is available only from central offices which have been arranged to provide these services. The service is provided subject to the availability of facilities. This service is not compatible with all service offerings such as Customized Code Restriction, International Call Blocking and Toll Terminals.
- C. Subscribing to this service does not relieve the subscriber of responsibility for calls, other than Company intraLATA calls, which originate from the number. Failure of other long distance providers to act on the information digits passed to them could result in charges being placed on the subscriber's number.
- D. All local calls and calls to Company numbers such as repair service, Directory Assistance Service and public emergency service numbers such as 911 and 1+ 800 calls will be permitted from the establishment.
- E. This service is available to all business and residence customers.
- F. Selective Class of Call Screening can be suspended as specified in A2.3.16 of this Tariff. During the period of suspension, no recurring charge applies.

**A13.12.2 Rates And Charges**

- A. The following rates and charges will apply in addition to a Service Charge.

1. *MultiServ\* service and PBX Trunk*

(a) Per central office line equipped for screening  
including

*MultiServ\* service main station lines*

(b) (Obsoleted, See Section A113.)

(c) Per PBX trunk equipped for screening

2. *ESSX® service, Digital ESSX® service and MultiServ PLUS\* service*

(a) Per NAR equipped for screening

(b) Per main station line equipped for screening

Monthly Rate	USOC	
\$1.10	SRG	(C)
-	NA	(C)
7.10	SRG	(C)
7.10	SRGGR	(N)
-	SRGPI	

**A13.13 Dormitory Communications Service****A13.13.1 General**

- A. Dormitory Communications Service (DCS) is available to public and private educational institutions for residential use by students, faculty members or employees who reside in dormitories or other residential quarters owned, leased, or under the supervision of the educational institution.

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REQUEST: With respect to each of the FX-Like Services identified in response to DR No. 9, please explain how you rate traffic originated or terminated to customers, and provide all documentation supporting your answer. Your answer should specifically address each of the types of traffic identified in DR 3, with the name of the appropriate FX-Like Service substituted for "FX" in each of the traffic descriptions.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and that responding to it would be unduly burdensome. Without waiving these objections, BellSouth provides the following responses.

- a. A call placed by a BellSouth end user to a BellSouth RCF customer where the NXX code of the dialed number is within the calling party's local calling area, but the RCF customer is not physically located within that local calling area is rated and billed, for retail purposes, as a local call. The rates the BellSouth end user pays for placing that call to the RCF customer are booked as local revenue.

When the call is then forwarded to another location, the RCF customer is responsible for paying per-minute usage charges at local rates (which are booked as local revenue) or toll rates (which are booked as toll revenue) as described in Tariff Section A13.

- b. Not applicable. The RCF customer cannot place a call from its RCF number.



RESPONSE: (continued)

- c. A call placed by a BellSouth end user to a BellSouth RCF customer where the NXX code of the dialed number is within the same LATA as the calling party, but not within the same local calling area, and where the RCF customer is physically located in the same local calling area as the calling party is rated and billed, for retail purposes, as a local call (which is booked as local revenue) or a toll call (which is booked as toll revenue) depending on the service subscribed to by the BellSouth end user making the call.

When the call is then forwarded to another location, the RCF customer is responsible for paying per-minute usage charges at local rates (which are booked as local revenue) or toll rates (which are booked as toll revenue) as described in Tariff Section A13.

- d. Not applicable. The RCF customer cannot place a call from its RCF number.
- e. A call terminated by an interexchange carrier to a BellSouth RCF customer is rated and billed, for inter-carrier compensation purposes, as an **access** call. These revenues are booked as network access revenues.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 13  
Page 1 of 1

REQUEST: With respect to each of the FX-Like Services identified in response to DR No. 9, please explain how you bill for traffic originated or terminated to customers, and provide all documentation supporting your answer. Your answer should specifically address each of the types of traffic identified in DR 3, with the name of the appropriate FX-Like Service substituted for "FX" in each of the traffic descriptions.

RESPONSE: Please see BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 12.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 14  
Page 1 of 1

**REQUEST:** With respect to each of the FX-Like Services identified in response to DR No. 9, please explain how you account for traffic originated or terminated to customers, and provide all documentation supporting your answer. Your answer should specifically address each of the types of traffic identified in DR 3, with the name of the appropriate FX-Like Service substituted for "FX" in each of the traffic descriptions.

**RESPONSE:** Please see BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 12.



REQUEST: Please provide a technical description of how the FX-like services identified in response to DR No. 9 are provided to customers, including diagrams and descriptions of any ancillary features (e.g., collocation of customer equipment).

RESPONSE: BellSouth objects to Adelphia's 1<sup>st</sup> Data Requests, Item No. 15, on the grounds that it is overly broad, that responding to it would be unduly burdensome, and that it seeks information that is irrelevant and that is not reasonable calculated to lead to the discovery of admissible evidence. Without waiving these objections, BellSouth responds that remote call forwarding ("RCF") is an exchange service that allows incoming calls to be forwarded to a telephone number at a distant location. RCF also allows incoming calls to be forwarded to cellular service. The RCF number has one access path that allows only one call at a time to be forwarded. Additional access paths may be ordered to allow additional calls to be forwarded, provided the distant location is equipped to receive them. RCF requires neither a physical telephone set nor physical input by a customer to have calls forwarded

See also BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 10.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 16  
Page 1 of 1

REQUEST: Please identify all rates that are or could be charged to customers purchasing the FX-like services identified in your response to DR No. 9.

RESPONSE: See BellSouth's tariff provided in response to Adelphia's 1<sup>st</sup> Data Request, Item No. 11.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 17  
Page 1 of 1

**REQUEST:** Please identify the number of customers in Tennessee who subscribe to or purchase FX-like services identified in response to DR No. 9.

**RESPONSE:** BellSouth does not maintain the number of customers for these services. The number of lines equipped with Remote Call Forwarding in the State of Tennessee as of the end of December 2000 is 19,748.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 18  
Page 1 of 1

REQUEST: Have you ever billed or received reciprocal compensation for calls received from CLECs for termination to your customers who have purchased or subscribed to FX-Like Services? Please explain your answer.

RESPONSE: Yes. If the NXX of the called number is associated with the local calling area in which the call originates, BellSouth bills a CLEC for reciprocal compensation for calls from the CLEC's end users to a BellSouth RCF number if the RCF customer is not an ISP. BellSouth does not bill CLECs for reciprocal compensation for such calls when the RCF customer is an ISP.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 19  
Page 1 of 1

**REQUEST:** If the response to the preceding DR is in the affirmative, please describe each occurrence, including: (a) the name of the carrier billed or paying the reciprocal compensation; (b) the amount of reciprocal compensation billed and/or paid; and (c) identify and include a copy of the interconnection agreement and/or arrangement under which such reciprocal compensation was billed and/or paid.

**RESPONSE:** This data is not available because the billing of reciprocal compensation is not tracked based on the type of service used by the end user receiving the call.



REQUEST: For any of the FX services identified in DR 3 or for any of the FX-Like services identified in DR 9, does BellSouth assign numbers to customers who are physically located in a different state than the rate center with which the assigned NXX is associated?

RESPONSE: BellSouth assumes that the reference to Adelphia's 1<sup>st</sup> Data Requests, Item No. 9 was intended to be a reference to Adelphia's 1<sup>st</sup> Data Requests, Item No.10, and BellSouth will respond to this request in accordance with that assumption.

With regard to the intrastate FX service discussed in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 3, BellSouth does not assign numbers to intrastate FX customers who are physically located in a different state than the rate center with which the assigned NXX is associated.

BellSouth objects to this Request to the extent that it relates to the Remote Call Forwarding (RCF) service discussed in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No.10 on the grounds that it is overly broad, that it is vague, and that responding to it would be unduly burdensome. Without waiving this objection, and in an effort to be responsive, BellSouth states that the RCF service has no effect on the telephone number that has been assigned to the RCF customer. Instead, when activated by the customer, the RCF service simply allows the customer to have calls that are placed to its number automatically forwarded to a different telephone number of the customer's choosing. The RCF customer may elect to have the calls forwarded to an out-of-state location and, as explained in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No.12, the RCF customer pays any toll charges associated with any call that is forwarded in this manner.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 21  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, has BellSouth ever billed or received reciprocal compensation to carriers originating calls to the customers described in the preceding DR?

RESPONSE: Please see BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item Nos. 7, 18, and 20.



REQUEST: For any of the FX services identified in DR 3 or for any of the FL-Like services identified in DR 9, does BellSouth assign numbers to customers who are physically located in a different local access transport area ("LATA") than the rate center with which the assigned NXX is associated?

RESPONSE: BellSouth assumes that the reference to Adelphia's 1<sup>st</sup> Data Requests, Item No. 9 was intended to be a reference to Adelphia's 1<sup>st</sup> Data Requests, Item No.10, and BellSouth will respond to this request in accordance with that assumption.

With regard to the intrastate FX service discussed in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 3, BellSouth does not assign numbers to intrastate FX customers who are physically located in a different LATA than the rate center with which the assigned NXX is associated.

BellSouth objects to this Request to the extent that it relates to the Remote Call Forwarding (RCF) service discussed in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No.10 on the grounds that it is overly broad, that it is vague, and that responding to it would be unduly burdensome. Without waiving this objection, and in an effort to be responsive, BellSouth states that the RCF service has no effect on the telephone number that has been assigned to the RCF customer. Instead, when activated by the customer, the RCF service simply allows the customer to have calls that are placed to its number automatically forwarded to a different telephone number of the customer's choosing. The RCF customer may elect to have the calls forwarded to a location in a different LATA and, as explained in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No.12, the RCF customer pays any toll charges associated with any call that is forwarded in this manner.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 23  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, has BellSouth ever billed or received reciprocal compensation to carriers originating calls to the customers described in the preceding DR?

RESPONSE: Please see BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item Nos. 7, 18, and 22.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 24  
Page 1 of 1

REQUEST: Do you contend that you incur higher costs to deliver a call to a CLEC's customer where the customer is physically located in a different rate center than the rate center associated with such NXX code?

RESPONSE: Given that the parties have resolved the Points of Interface issues in this arbitration, no. This Data Request, however, has nothing to do with the issue in this arbitration, which is whether reciprocal compensation is due on calls that originate in one local calling area and terminate in a different local calling area. The FCC's rules clearly provide that reciprocal compensation obligations apply only to "local telecommunications traffic," which is defined as traffic that "originates and terminates within a local service area established by the state Authority." *See* 47 CFR §51.701.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 25  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, please produce any documents, including but not limited to cost studies, which support your contention.

RESPONSE: See BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 24.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 26  
Page 1 of 1

**REQUEST:** Please state whether your costs of originating locally-dialed calls from your customers to Adelphia customers having line numbers assigned to the same NPA-NXX code vary depending on the physical location of those customers. If the response is yes, please: (i) identify with specificity the costs that vary and the extent to which they vary; (ii) identify with specificity the costs incurred when Adelphia's customers is physically located inside the local calling area of the calling party; (iii) identify with specificity the costs incurred when Adelphia's customers physically located outside the local calling area of the calling party; and (iv) provide all documentation, including any cost studies, supporting the specific contention that the costs in originating locally-dialed calls vary depending upon where Adelphia's customer is located.

**RESPONSE:** Given that the parties have resolved the Points of Interface issues in this arbitration, BellSouth's costs of originating locally-dialed calls from its customer to Adelphia customers do not vary based upon the location of Adelphia's customers. However, as noted in BellSouth's response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 24, that has nothing to do with the issue in this arbitration.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 27  
Page 1 of 1

REQUEST: Do you contend that you must deliver a call placed by your end user to a CLEC customer assigned to a particular NXX to different locations or over different routes depending on whether the CLEC customer is physically located within or without the rate center associated with that NXX code? If your answer is yes, please explain the factual and legal basis for your contention.

RESPONSE: No. This question, however, has nothing to do with the originating and terminating points of a given call and it has nothing to do with whether reciprocal compensation or access charges apply to a given call.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 28  
Page 1 of 1

**REQUEST:** If a BellSouth customer in rate center "A" were to place a call to an Adelphia customer physically located in rate center "A" but whose assigned NPA/NXX code corresponded to rate center "B", how would you rate that call? Please explain your response.

**RESPONSE:** BellSouth objects to this Data Request on the grounds that it is vague in that it does not provide sufficient detail for BellSouth to respond to the question. Without waiving this objection, BellSouth responds that the rating and billing of this call, for retail purposes, would depend on whether BellSouth or an interexchange carrier (IXC) carries the call.

If BellSouth carries the call, the call would be rated and billed, for retail purposes, based on the local or toll plan selected by the BellSouth customer for a call going from rate center A to rate center B.

If an IXC carries the call, the call would be rated and billed, for retail purposes, by the IXC and not by BellSouth. For inter-carrier compensation purposes, BellSouth would bill originating access to the IXC.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 29  
Page 1 of 1

**REQUEST:** Has BellSouth developed a process by which it can separate or identify FX or FX-Like Service traffic from all other local traffic?

**RESPONSE:** BellSouth objects to the blanket characterization of FX or FX-Like Service traffic as local. Without waiving this objection, please see BellSouth's responses to Adelphia's 1<sup>st</sup> Data Requests, Item Nos. 7 and 30.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 30  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, please provide a description of that process, and copies of all documents and workpapers related to the development of that process.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad, that responding to it would be unduly burdensome, and that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, BellSouth responds that BellSouth is building a database of all existing BellSouth FX numbers and is developing programming that will immediately place newly assigned FX numbers into the database. This database will be used to prevent billing of reciprocal compensation on calls to BellSouth FX numbers. Documents responsive to this request are proprietary and will be provided upon execution of an appropriate protective order in this docket.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 31  
Page 1 of 1

**REQUEST:** Would implementing a process to separate FX or FX-Like Service traffic from all other local traffic require BellSouth, Adelphia, or other LECs to implement a new billing system to rate such traffic for purposes of intercarrier compensation?

**RESPONSE:** BellSouth objects to the blanket characterization of FX or FX-Like Service traffic as local. Without waiving this objection, BellSouth states that implementing the process described in BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 30 will require modifications to the existing billing systems used by BellSouth. BellSouth does not have sufficient knowledge to speculate on what changes Adelphia or another LEC may need to make to its billing systems. BellSouth assumes, however, that any necessary changes would not be significantly different than any changes Adelphia or another LEC may need to make in order to comply with rulings in several other jurisdictions that calls to "Virtual NXX" numbers are not local and/or that reciprocal compensation does not apply to such calls.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 32  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, what does BellSouth project the cost of implementing such a billing system to be?

RESPONSE: BellSouth has no way of projecting any such cost with regard to Adelphia or any other LEC. BellSouth projects that the modifications to its systems necessary to implement the process described in BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 30 will be approximately \$100,000.00.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 33  
Page 1 of 1

REQUEST: Please provide any cost studies, or documents which support your answer to the preceding DR.

RESPONSE: There are none. BellSouth's response to the preceding data request is based on verbal estimates.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 34  
Page 1 of 1

**REQUEST:** Would a new billing system by which FX or FX-Like Service traffic is separated from all other local traffic require BellSouth, Adelphia, and other LECs to look at every call, every month, on a line-by-line basis to determine whether the call is being delivered to a customer not physically located in the same rate center as the originating customer? Please explain your answer.

**RESPONSE:** BellSouth objects to the blanket characterization of FX or FX-Like Service traffic as local. Without waiving this objections, BellSouth has no way of answering this question with regard to Adelphia or other LECs. The process described in BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 30, however, will not involve looking at every call, every month, on a line-by-line basis. Instead, it will involve looking at every call record for terminating intercarrier calls and analyzing the service which has been ordered by the called party. If the called party has ordered an FX service, then the call will not be treated as a local call for inter-carrier compensation purposes.



REQUEST: Does BellSouth propose that, even if a single Adelphia customer were physically located outside the rate center associated with a particular assigned NPA/NXX code, Adelphia should be denied compensation for all calls placed to that particular code? Please explain your answer.

RESPONSE: Generally, BellSouth proposes that Adelphia identify traffic to Virtual NXX numbers that originates in one local calling area and terminates in another local calling area so that BellSouth can properly treat that call for inter-carrier compensation purposes. *See* Section 6.1.6 of the attached proposal sets forth BellSouth's proposal in more detail. As indicated in Section 6.1.6.1 of the attached proposal:

If Adelphia does not identify such traffic to BellSouth, to the best of BellSouth's ability BellSouth will determine which whole Adelphia NPA-NXXs on which to charge the applicable rates for originating intrastate network access service as reflected in BellSouth's Intrastate Access Service Tariff. BellSouth shall make appropriate billing adjustments if Adelphia can provide sufficient information for BellSouth to determine whether said traffic is local or toll.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 35

# ATTACHMENT



6.1.6 The Parties agree that the jurisdiction of a call is determined by its originating and terminating (end to end) points. For the purpose of delivery of BellSouth originating traffic to Adelphia, BellSouth will pay to Adelphia reciprocal compensation for Local Traffic terminating to Adelphia end users physically located in the BellSouth rate center to which the Adelphia end user's NPA/NXX is assigned. If Adelphia assigns NPA/NXXs to specific BellSouth rate centers and assigns numbers from those NPA/NXXs to end users physically located outside of the rate center to which the NPA/NXX is assigned, BellSouth traffic originating from within the BellSouth rate center where the NPA/NXX is assigned and terminating to an Adelphia customer physically located outside of such rate center, and at a location toll to the BellSouth originating rate center, shall not be deemed Local Traffic, and no compensation from BellSouth to Adelphia shall be due therefore. Further, Adelphia agrees to identify such traffic to BellSouth and to compensate BellSouth for such traffic at BellSouth's tariffed switched access rates. In addition, Adelphia should not use NPA/NXXs to collect BellSouth originated local or intraLATA toll traffic for delivery to a point outside the LATA from where the originating NPA/NXX rate center resides.

6.1.6.1 If Adelphia does not identify such traffic to BellSouth, to the best of BellSouth's ability BellSouth will determine which whole Adelphia NPA/NXXs on which to charge the applicable rates for originating intrastate network access service as reflected in BellSouth's Intrastate Access Service Tariff. BellSouth shall make appropriate billing adjustments if Adelphia can provide sufficient information for BellSouth to determine whether said traffic is local or toll.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 36  
Page 1 of 1

REQUEST: If the answer to the preceding DR is in the affirmative, please explain the basis for this proposal and provide all support for such.

RESPONSE: Please see BellSouth's Response to Adelphia's 1<sup>st</sup> Data Requests, Item No. 35.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 00-00927  
Adelphia's 1<sup>st</sup> Data Requests  
January 10, 2001  
Item No. 37  
Page 1 of 1

**REQUEST:** Does BellSouth contend that a CLEC should be permitted to charge BellSouth originating access when a CLEC's customers dials a local number to reach a BellSouth FX customer physically located in a different local exchange area? Please explain your answer.

**RESPONSE:** If the Authority adopts BellSouth's position on the "Virtual NXX" issue in this arbitration, BellSouth should (and will) pay originating access charges to the originating CLEC when that CLEC's end users place calls to a BellSouth FX number.

Similarly, when a BellSouth end user calls a "virtual NXX" number to reach a CLEC end user in a different local calling area, the CLEC should pay BellSouth originating access.